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AUG 25 2025

BY MAIL

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Class Member ID: 83246XRBXP2RH

8/21/2025

Clerk of Court

United States District Court, Eastern District of Missouri, Eastern Division

111 South 10th Street, Suite 3.300

St. Louis, MO 63102

RE: Objection to Proposed Settlement – In re Panera Data Security Litigation, Case No. 4:24-cv-00847-HEA

Dear Judge Autrey,

I am writing to formally object to the proposed settlement in the Panera Data Security Litigation (Case No. 4:24-cv-00847-HEA). I am a member of the Settlement Class, as I received a notice from Panera regarding the March 2024 data breach that exposed my personal information, including my Social Security number.

1. Inadequacy of the Settlement Fund

The proposed settlement fund of \$2.5 million is wholly inadequate given the severity of the breach. Social Security numbers, once compromised, cannot be changed like a credit card number. The risk of identity theft will follow victims for the rest of their lives, yet the settlement offers only small, one-time payments.

2. Violation of Missouri's Data Breach Notification Law (RSMo § 407.1500)

Panera failed to comply with Missouri's data breach notification law, which requires businesses to notify affected individuals "without unreasonable delay" and to notify the Missouri Attorney

General if more than 1,000 residents are impacted. Panera waited up to 86 days before informing victims of the breach, depriving us of the opportunity to take timely action to protect ourselves. This delay appears to directly contradict Missouri law and increased the risk of harm to all affected individuals.

3. Negligence in Safeguarding Data

Panera demonstrated negligence in handling employees' and customers' most sensitive personal information. While the company guards its recipes and trade secrets with utmost care, it failed to extend the same protection to the Social Security numbers of the people who work for and patronize Panera. This shows misplaced priorities: protecting bread, salad, and soup recipes over protecting the livelihoods and identities of its employees and customers.

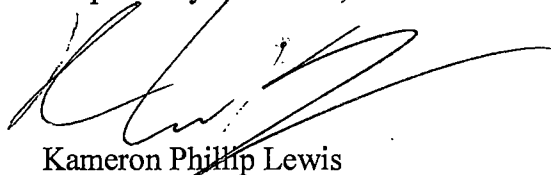
4. Attorney's Fees vs. Class Member Compensation

The proposed attorney's fees in this case are disproportionate compared to what individual class members are likely to receive. In many data breach settlements, class members end up with token payments, while lawyers receive large sums. This imbalance underscores the inadequacy and unfairness of the settlement.

For these reasons, I respectfully urge the Court to reject the proposed settlement as unfair, unreasonable, and inadequate. Panera's actions violated Missouri's statutory obligations and its duty of care to protect sensitive data. A more meaningful settlement should be required—one that provides long-term protection for victims and reflects the seriousness of exposing permanent identifiers like Social Security numbers.

I request that my objection be considered in full and that it be included in the Court's record for the final fairness hearing scheduled for January 29, 2026.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kameron Phillip Lewis', is written over a horizontal line.

Kameron Phillip Lewis

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